



J. Maichle Bacon, M. P. H., R.S.  
Administrator

Phone (81 5) 962-5092  
Fax (81 5) 962-4203

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March 24, 1999

Arthur Avenue Annex  
1003 Arthur Avenue  
Phone: (81 5) 967-3422  
Fax: (81 5) 967-3423

North Main Annex  
2909 N. Main Street  
Phone: (81 5) 282-6667  
Fax: (81 5) 282-5247

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane Room 1061  
Rockville, MD 20852

Re: Comments on the proposed rule making for tanning facilities (Docket 98N-1170).

Dear Sirs:

As an inspector of tanning facilities for Winnebago County, I must base my input on personal experiences and past / current problems. (1) Exposure schedules. I believe that standard exposure schedules for regular output, high output and stand-up units are needed. How does anyone determine how long skin types III and IV can tan on a unit with a schedule for skin type 11 only? These beds are in our county and cannot be regulated for exposure times properly. If I do not have the ability or training to determine exposure times, how do I trust owners and operators ranging in age from 16 to 65 years of age to do this?

(2) Exposures 24 hours apart. I would like to see the standard changed to 48 hours between exposures. The greatest number of beds in our county have recommended schedules indicating week 1, week 2 etc. / sessions 1-3,4-6, etc. on their labels. Some beds say on the label to wait 48 hours between uses. Operators are confused by the required question "Have you tanned in the past 24 hours?" and the tanning schedule on the beds.

(3) Recertification documentation. There is a need for standard papers, labels and manufacturer information on recertified beds. The recertification documentation needs to be at the facility at the time of inspection.

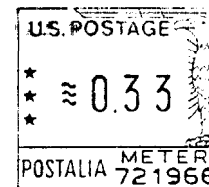
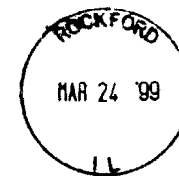
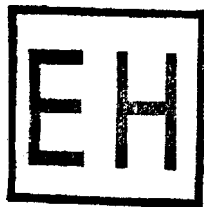
Thank you for the opportunity to provide you with my concerns and comments.

Respectfully,

Lisa Lynn Sprecher  
Environmental Health Inspector

98N-1170

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